



MEC  
OPINION NO.

2008.07.CF.006

**STATE OF MISSOURI**

MISSOURI ETHICS COMMISSION  
P. O. BOX 1254  
JEFFERSON CITY, MISSOURI 65102

573/751-2020  
1-800/392-8660

July 21, 2008



At the July 16, 2008 meeting of the Missouri Ethics Commission, your request for an opinion was discussed. The following is the Commission's response to your questions:

*The Missouri Federation of Republican Women ("MoFRW") is primarily an educational group. We educate our members on issues, candidates, and the Republican philosophy, and support the party. We accept donations to our Century and Millennium Clubs from a few candidates who wish to support our organization. However, these donations are used in our general operating fund for our programs.*

*During election years, different districts and clubs sponsor campaign schools. A minimal registration fee is paid to cover lunch, speakers and materials. Most of the schools do not collect enough registration and the deficit is offset from our operating budget. Candidates attend these schools and pay the registration fee (this year it was \$25.00). Our purpose is not to donate money to campaign committees. All funds are for the general operations of the MoFRW. Does the MoFRW fall within the guidelines of political organizations required to file campaign finance disclosure reports?*

Section 130.011 (7) defines a "committee" as: "a person or any combination of persons, who accepts contributions or makes expenditures for the primary or incidental purpose of influencing or attempting to influence the action of voters for or against the nomination or election to public office of one or more candidates or the qualification, passage or defeat of any ballot measure or for the purpose of paying a previously incurred campaign debt or obligation of a candidate or the debts

or obligations of a committee or for the purpose of contributing funds to another committee:

(a) "Committee", does not include:

c. A corporation, cooperative association, partnership, proprietorship, or joint venture organized or operated for a primary or principal purpose other than that of influencing or attempting to influence the action of voters for or against the nomination or election to public office of one or more candidates or the qualification, passage or defeat of any ballot measure, and it accepts no contributions, and all expenditures it makes are from its own funds or property obtained in the usual course of business or in any commercial or other transaction and which are not contributions as defined by subdivision (12) of this section;"

A contribution is defined under Section 130.011(12), as a "... donation of money or anything of value for the purpose of supporting or opposing the nomination or election of any candidate for public office or the qualification, passage or defeat of any ballot measure, or for the support of any committee supporting or opposing candidates or ballot measures or for paying debts or obligations of any candidate or committee previously incurred for the above purposes. " The definition of expenditure under Section 130.011(16), RSMo contains similar defining purposes.

Under the facts that you present, your organization does not meet the definition of committee under Chapter 130 of the Missouri Revised Code, and it does not receive contributions or make expenditures under Chapter 130. For these reasons, your organization does not fit the statutory definition under Chapter 130, and you are not required to file campaign finance disclosure reports.

Sincerely,

  
Stacey Heisten  
Interim Executive Director

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#### NOTICE

Anyone examining this advisory opinion should be careful to note that an opinion of the Missouri Ethics Commission deals only with the specific request to which the opinion responded and only as to the law as it existed at the date of the response and cannot be relied upon for any other purpose or in any other manner.